

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

**NOTICE OF FIRST APPLICATION FOR COMPENSATION OF THE ATTORNEYS REPRESENTING
THE LIQUIDATING TRUSTEE OF THE GALARDI CREDITORS TRUST,
DEADLINE TO OBJECT, AND FOR HEARING**

PLEASE TAKE NOTICE that a *First Application for Compensation of the Attorneys Representing the Liquidating Trustee of the Galardi Creditors Trust* (the "Application") has been filed in the above case. Pursuant to the Application, the Court is requested to allow and award compensation to Jones & Walden LLC, as follows:

- (1) \$130,882.00 representing fees;
- (2) \$2,076.13 representing actual out-of-pocket expenses incurred on behalf of the Liquidating Trustee; and
- (3) that the Liquidating Trustee be authorized and directed to pay the Law Firm from the Galardi Creditors Trust the \$132,958.13 requested award.

YOUR RIGHTS MAY BE AFFECTED. You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. **If you do not have an attorney, you may wish to consult one.** If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the motion may be obtained upon written request to counsel for the Movant (identified below) or at the Clerk's office.

If you do not want the court to grant the relief sought in the Application or if you want the court to consider your views on the Application, then you or your attorney shall file with the court a written objection or response on or before **February 23, 2024**, pursuant to Fed.R.Bankr.P. 9006(f). If you are receiving this notice by mail, you may add three (3) days to the response date stated above. The objection or response should be sent to: Clerk, U.S. Bankruptcy Court, Middle District of Georgia, P.O. Box 1957, Macon, GA 31202, (478) 752-3506.

If an objection or response is filed, a hearing on the Application shall be held on **March 6, 2024, at 11:00 a.m. at the U.S. Bankruptcy Court, Macon Courthouse, Courtroom A, 433 Cherry Street, Macon, Georgia 31201**. If you mail your response or objection to the Court for filing, you shall send it early enough so that the court will receive the objection or response on or before the date stated above. Any response or objection shall also be served on the Movant.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting relief.

This notice is sent by the undersigned pursuant to LBR 2016(c)(2).

This 2nd day of February, 2024.

JONES & WALDEN LLC

/s/ Leon S. Jones

Leon S. Jones

Georgia Bar No. 003980

Attorneys for Liquidating Trustee

699 Piedmont Avenue, NE

Atlanta, Georgia 30308

404-564-9300

ljones@joneswalden.com

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

**FIRST APPLICATION FOR COMPENSATION OF THE ATTORNEYS REPRESENTING THE
LIQUIDATING TRUSTEE OF THE GALARDI CREDITORS TRUST**

TO: THE HONORABLE JAMES P. SMITH
CHIEF JUDGE, U.S. BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

COMES NOW Jones & Walden LLC (the "Law Firm"), the attorneys for Thomas T. McClendon, as Liquidating Trustee of the Galardi Creditors Trust (the "Trustee"), and files this, its *First Application for Compensation of the Attorneys Representing the Liquidating Trustee of the Galardi Creditors Trust* (the "Application"), and in support thereof respectfully shows as follows:

1. On or about January 27, 2022, (the "Petition Date"), Teri G. Galardi (the "Debtor") filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq.
2. On April 10, 2023, Debtor filed an Amended Joint Chapter 11 Plan of Reorganization (Doc. No. 401) ("Plan"). The Plan provided for the Debtor's establishment of a liquidating trust for the benefit of the Holders of Class 8 Unsecured Claims and the execution of a Trust Agreement for the Galardi Creditors Trust ("Trust Agreement") to be in effect on the Effective Date of the Plan.
3. On April 14, 2023 (the "Appointment Date"), the Court entered the Order Confirming Joint Plan of Reorganization (Doc. No. 410) ("Confirmation Order") confirming the Plan, authorizing the execution of the Trust Agreement, and appointing the Trustee.
4. On April 25, 2023, Debtor and Trustee executed the Trust Agreement.
5. The Court has jurisdiction over this Application pursuant to Article 9.1(m) of the Plan (retention of jurisdiction over all matters regarding or related to the administration of the Galardi Creditors Trust) and Section 7.2 of the Trust Agreement.

6. Article 4.2 of the Trust Agreement authorizes the Trustee to employ attorneys and other professionals “whose services may be reasonably necessary or advisable... to advise or assist [Trustee] in the discharge of his duties... and to pay reasonable compensation” to such professionals out of the Trust Estate.

7. The Trustee has employed the Law Firm as Trustee’s counsel in this case. The Law Firm shows that it has represented the Trustee in this case since the Appointment Date.

8. The Law Firm makes its Application for the allowance of compensation for professional services rendered to the Trustee for the period of time from April 14, 2023, through January 31, 2024 (“Application Period”), pursuant to Section 4.2 of the Trust Agreement, and to the extent applicable, 11 U.S.C. §§ 330 and 331. All services for which compensation is requested were performed on behalf of the Trust and not on behalf of any other party, creditor, persons or party in interest.

9. The Law Firm has not yet received payment from the Liquidating Trustee on these fees requested and brings this Application prior to payment to the Law Firm. The Law Firm has had numerous conferences with the Trustee, beneficiaries of the Trust, and other interested parties in reference to this case. The Law Firm has assisted the Trustee with making distributions to Holders of Class 8 Unsecured Claims and has performed many other services necessary and proper to the administration of the Trust.

10. The time expended by the Law Firm and the work performed by the Law Firm, for the period for which this Application is made, is duly itemized and set forth in Exhibit “A” which is attached hereto and incorporated herein by this reference.

11. The out-of-pocket expenses incurred by the Law Firm during the period for which this Application is made are duly itemized and set forth in Exhibit “A” which is attached hereto and incorporated by this reference. The copy costs reflected on Exhibit “A” are charged at the rate of \$0.10 per page. The facsimile costs are charged at the rate of \$1.00 per outgoing page.

12. No agreement or understanding exists between the Law Firm and any other person for the sharing of compensation received or to be received for services rendered in connection with this case.

13. The Law Firm shows that it has expended a total of 437.90 hours in law firm time for the Application Period, in the total amount of \$130,882.00. The Law Firm shows that it has incurred a total of \$2,076.13 in out-of-pocket expenses and advances in the course of such representation and has thereby earned a total of \$130,958.13. The Law Firm respectfully requests this Court to allow such sums as professional compensation and an expense of the Galardi Creditors Trust. The Law Firm requests that the Court award the Law Firm said amount and authorize the Liquidating Trustee to pay the Law Firm from the Galardi Creditor Trust \$132,958.13, which amount represents the requested fees and expenses.

14. The Law Firm seeks permission for the Liquidating Trustee to pay the amounts requested pursuant to this Application from the Trust's funds. The Law Firm requests that the Court authorize such compensation pursuant to Sections 4.2 and 7.6 of the Trust Agreement.

15. The Law Firm respectfully makes the following representations with regard to the 12-factor Johnson test to the extent the same is applicable:

- (a) Time and Labor Required: The Law Firm has expended a total of 437.90 law firm hours through January 31, 2024, at the following rates:

<u>Attorney(s)</u>	<u>Hourly Rate</u>
Leon S. Jones	\$450.00-\$475.00
Leslie M. Pineyro	\$395.00
Eric J. Breithaupt	\$395.00
William D. Matthews	\$375.00
Mark D. Gensburg	\$325.00-\$350.00
Adam Ekbohm	\$325.00
Mandy L. Milner	\$250.00-\$300.00
Bethany L. Strain	\$250.00-\$300.00
Ellen Wooden (Paralegal)	\$200.00
Tessa Vuncannon (Paralegal)	\$200.00
Megan Cypher (Paralegal)	\$200.00
Daniela Manzo (Paralegal)	\$200.00
Blake Dernus (Paralegal)	\$150.00

- (b) Novelty and Difficulty of Questions Presented: The Chapter 11 reorganization case involves the effort to resolve distribution disputes and make distributions on more than \$20 million in unsecured claims. The Law Firm shows that the novelty and difficulty of questions presented are more than those normally associated with a Chapter 11 bankruptcy case.

- (c) Skill Requisite to Perform Legal Services Properly: The Law Firm respectfully represents that it has the skill requisite to perform legal services heretofore rendered in a proper fashion.
- (d) The Preclusion of Other Employment Due to Acceptance of the Case: The Law Firm respectfully requests that the time expended by the Law Firm in connection with this case could have been devoted to matters being handled for other clients, but for the time demands placed upon the Law Firm by the Law Firm's involvement in this case.
- (e) Customary Fee for the Type of Services Rendered: The Law Firm shows that all fees requested by the Law Firm were generated by applying the Law Firm's normal hourly billing rate for the applicable date to the number of hours actually expended. Such itemization is detailed on Exhibit "A". The Law Firm respectfully represents that the customary compensation for the attorney services in connection with a bankruptcy case is upon an hourly billing basis.
- (f) Whether Fee is Fixed or Contingent: The Law Firm's charges are subject to being awarded by this Court under 11 U.S.C. § 330 and the Trust Agreement. The Fee is thus not truly fixed or contingent but has some characteristics of both.
- (g) Time Limitations Imposed by Client or Other Circumstances: The Law Firm shows that many of the services rendered have been performed under exacting time limitations imposed by the nature of the case.
- (h) Amount Involved and Results Obtained: The Law Firm is handling a large number of routine and complex Chapter 11 issues on behalf of the Trustee. The Court entered the Confirmation Order on April 14, 2023. The Law Firm has represented the Trust since the Appointment Date.
- (i) Experience, Reputation, and Ability of Attorneys: The Law Firm respectfully represents that it has had a significant amount of experience within the areas involved in this representation.

- (j) Undesirability of the Case: The Law Firm respectfully represents that this factor is not normally applicable to a Chapter 11 case but that this case does include unusual challenges.
- (k) Nature and Length of Professional Relationship with the Client: The Law Firm shows that it has represented the Trustee in this case since the Appointment Date.
- (l) Awards in Similar Cases: The Law Firm respectfully represents that its Application is in keeping with similar applications for Chapter 11 compensation filed by attorneys in bankruptcy cases within this district.

16. The Law Firm requests that any order entered granting this Application, once entered, be effective immediately by providing that any 14-day stay is waived under Bankruptcy Rule 6004(h).

WHEREFORE, the Law Firm prays that it be allowed Chapter 11 compensation as follows:

- (1) \$130,882.00 representing fees;
- (2) \$2,076.13 representing actual out-of-pocket expenses incurred on behalf of the Trustee; and
- (3) that the Liquidating Trustee be authorized and directed to pay the \$132,958.13 requested award to the Law Firm from the Galardi Creditors Trust.

RESPECTFULLY SUBMITTED this 2nd day of February, 2024.

JONES & WALDEN LLC

/s/ Leon S. Jones

Leon S. Jones

Georgia Bar No. 003980

Attorneys for Liquidating Trustee

699 Piedmont Avenue, NE

Atlanta, Georgia 30308

404-564-9300

ljones@joneswalden.com

EXHIBIT "A" FOLLOWS

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JONES & WALDEN, LLC
 Attorneys At Law

699 Piedmont Avenue, NE * Atlanta, GA 30308
 404-564-9300 • www.joneswalden.com

Galardi Liquidating Trust
 c/o Tom McClendon, Trustee
 699 Piedmont Avenue NE
 Atlanta, GA 30308

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 February 2, 2024
 Account No: 2345.007
 Invoice No: 67954

Re: Attorneys for Liquidating Trustee

Fees

			Rate	Hours	
04/25/2023	LSJ	Conference with TM re plan implementation	450.00	0.20	90.00
05/01/2023	TJV	Prepare/revise trustee claim objections	200.00	0.40	80.00
	LSJ	Review debtors MOR	450.00	0.10	45.00
05/02/2023	TJV	Revise/finalize 4 claim objections (.3); prepare LWD into GCT re: 4766 Frontage Rd (.3); file and serve claim objections (.4)	200.00	1.00	200.00
05/03/2023	TJV	Revise claim objections (.2); finalize and file claim objections (.1); prepare/revise additional claim objections (.3); prepare amended Notices of Hearing & revise/finalize additional claim objections (.3); finalize, file and serve objections and amended Notices of Hearing (.5)	200.00	1.40	280.00
	LSJ	Review fee applications filed by Committee professionals, calendar hearing and deadlines (.1); prepare review Trustee McClendon's objections to claims, calendar hearings on same (.2)	450.00	0.30	135.00
05/04/2023	LSJ	Conference with TM (.2); Analysis of claims resolution strategy on duplicative and competing claims (.4)	450.00	0.60	270.00
05/05/2023	TJV	Revise class 8 DSDs and hypothecation agreements	200.00	0.10	20.00
	LSJ	Conference with TM re title on real estate collateral, review docs re same (.2)	450.00	0.20	90.00
05/09/2023	LSJ	Email exchange with chambers re scheduling status, conf in Galardi v Galardi A.P.	450.00	0.10	45.00
05/10/2023	TJV	Prepare Gabbe claim objections (.3); further prep (.2); further prep (.9); finalize Gabbe claim objections (.4); file and serve same (.2)	200.00	2.00	400.00
	LSJ	Conference with TM re strategy	450.00	0.10	45.00
05/12/2023	LSJ	Review email exchanges re claims of attorneys and lien claims on funds	450.00	0.10	45.00
05/16/2023	LSJ	Email exchange (Chambers re hearing schedule)	450.00	0.10	45.00
	LSJ	Review fee applications by debtor professionals, calendar			

Galardi Liquidating Trust

Re: Attorneys for Liquidating Trustee

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02/02/2024

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			Rate	Hours	
		hearing on same (.1); review Trustee McClendon's objections to Proof of Claim filed by Atstride Gabbe, calendar hearing on same (.1)	450.00	0.20	90.00
05/19/2023	DM	Prepare letters to mail out + mail out	200.00	2.50	500.00
	DM	Prepare mail merger, serve all letters on beneficial interests in trust	200.00	2.00	400.00
05/22/2023	TJV	Submit LWD & PT61 (Frontage Rd) for e-recording (.2); record 3 security deeds (Class 8) (.3)	200.00	0.50	100.00
	EYW	Process reimbursements and set up liquidating trust ledger	200.00	0.50	100.00
05/24/2023	DM	Prepare Notice of Withdrawal of Objection to Proof of Claim 97 (.2); file (.1)	200.00	0.30	60.00
	LSJ	Review amendments to Proof of Claim filed by Astrid Gabbe	450.00	0.10	45.00
05/25/2023	EYW	Process expense reimbursement for Paul Hanna	200.00	0.20	40.00
	LSJ	Review withdrawal of claim objections by Trustee re Gabbe claims	450.00	0.10	45.00
05/30/2023	LSJ	Conference with TM re fee requests by professionals	450.00	0.10	45.00
06/02/2023	TJV	Telephone conference with creditor Ebony Mayfield re case status and upcoming distribution	200.00	0.10	20.00
	WDM	Conference with TTM regarding insurance issues (0.2); review documents and send message to K. Furuglyas regarding property insurance needed for building (0.2)	375.00	0.40	150.00
06/05/2023	LSJ	Review claim transfer notice (Tiffany Thompson to Red Shield) (.1); review entered orders allowing applications of Committee's professionals (.1)	450.00	0.20	90.00
06/06/2023	WDM	Call to agent to leave voice mail and exchange email messages with K. Furuglyas regarding property insurance quote	375.00	0.30	112.50
	LSJ	Review A. Gabbe Response to Claim Objection, review Jamie Parker Response to Claim Objection, review J. Johnson Response to claim objection, review Shakir Williams Response to Claim Objection, review and calendar hearing set on same	450.00	0.30	135.00
	LSJ	Further review of responses to claim objections filed by Astrid Gabbe (.1); calendar hearing on same (review Notice of Hearing) (.1)	450.00	0.20	90.00
	LSJ	Review transfer of claim agreement filed (Tiffany Thompson to Red Shield), conf with TM re strategy on same	450.00	0.10	45.00
06/08/2023	BD	Prepare and file 4 orders (0.2)	150.00	0.80	120.00
06/09/2023	LSJ	Review entered fee order for debtor's professional, review claim distribution process for trust to creditors	450.00	0.10	45.00
06/12/2023	EYW	Process Paul Hanna expense reimbursement	200.00	0.40	80.00
	LSJ	Email exchange with chambers, review of calendar, status conference (Galardi v Galardi), review status of debtor's disbursements (.1)	450.00	0.10	45.00

Galardi Liquidating Trust

Re: Attorneys for Liquidating Trustee

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02/02/2024

Account No: 2345.007

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			Rate	Hours	
	LSJ	Review order disallowing claims of American Arbitration Association Rasheed Mays, BOA, and E. Griffin (.2); review fee orders entered for debtor's professionals; calendar hearing for July 12, 2023 (.2)	450.00	0.40	180.00
06/13/2023	LSJ	Review Court's entered orders disallowing multiple claims (BOA, Rasheed Mays, Am Arbitration Commission, and E. Griffin), review clerk's memo to trustee McClendon (NO CHARGE)	0.00	0.20	0.00
06/14/2023	BD	Prepare and file Astrid Gabbe Order disallowing claim (0.2)	150.00	0.20	30.00
06/15/2023	LSJ	Conference with TM re distribution consents	450.00	0.20	90.00
	TJV	Prepare letter to Red Shield Funding re claim transfers & trust agreement	200.00	0.70	140.00
	BD	Prepare, file, and mail out Certificate of service for Orders	150.00	0.40	60.00
06/16/2023	TJV	Finalize and issue correspondence to Red Shield Funding re claim transfers	200.00	0.40	80.00
	LSJ	Conference with TM re prep for claims objection hearing	450.00	0.50	225.00
06/17/2023	LSJ	Review entered order disallowing Gabbe claim no. 105 and service on same (.1); review clerk docket (notice filed of transfer of long claim to red shield funding) (.1)	450.00	0.20	90.00
06/20/2023	LSJ	Prepare distribution settlement correspondence including conf with TM	450.00	0.70	315.00
06/21/2023	TJV	Prepare service of Gabbe claim order and file certificate of service re same	200.00	0.10	20.00
	LSJ	Review Notice of Appearance by Jason Orenstein for Gabbe, conf TM re hearing, conf TM re hearing prep and strategy on claims objection	450.00	0.60	270.00
06/22/2023	LSJ	Review docket and multiple pleadings (including hearing re set notice), calendar re set hearing to July 31	450.00	0.10	45.00
06/23/2023	TJV	Revise motion to waive requirements and prepare order granting same (.3); finalize, file and serve motion (.2)	200.00	0.50	100.00
	LSJ	Review Motion to Limit Trust Reserve Requirements as to Proof of Claim 57 and 110 (Gabbe dispute) (.1); review docket, review notice of re set hearing on Gabbe claims and briefing schedule on dispute, calendar continued hearing and deadlines and same re Chris Kosachuk (.2)	450.00	0.30	135.00
06/26/2023	LSJ	Review transfer agreement/ notice (from Mays to Red Shield, Proof of Claim no. 106)	450.00	0.10	45.00
06/27/2023	TJV	Finalize and upload order granting motion to waive reserve requirements	200.00	0.10	20.00
06/28/2023	EYW	Process Clayton Co. Water invoice (4766 Frontage Road)	200.00	0.20	40.00
	LSJ	Prepare disbursement schedule and correspondence	450.00	0.10	45.00

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
06/29/2023	LMP	conference with TM re interpleader needs (.2)	395.00	0.20	79.00
	BD	Prepare and edit distribution cover letters (1.0)	150.00	1.00	150.00
06/30/2023	TJV	Revise creditor distribution letters (.1); finalize motion to disallow RSF claim transfers (.1); file and serve same (.2)	200.00	0.40	80.00
	DM	Prepare edits to letters	200.00	0.60	120.00
	MSC	Prepare correspondence to creditors	200.00	1.40	280.00
	LSJ	Conference with TM re distributions and prepare (.2); review Trustee's objections to Red Shield Transfers (.1)	450.00	0.30	135.00
	LSJ	Review entered order approving reserve adjustment on Gabbe and Red Shield claims (.1); review and calendar Mays objection to Red Shield transfer (.1)	450.00	0.20	90.00
07/05/2023	EYW	Conf with TM re claims register and revise same	200.00	1.00	200.00
	BD	Prepare and draft Galardi distribution letters	150.00	2.50	375.00
	LSJ	Conference with TM re strategy and disbursement letters, prepare same	450.00	0.40	180.00
07/06/2023	DM	File Order	200.00	0.10	20.00
	BD	Conference with Tom and Ellen re: distribution letters strategy (1.0)	150.00	1.00	150.00
	BD	Draft, edit, and revise distribution letters (2.0)	150.00	2.00	300.00
	LSJ	Review docket and status of pending matters, review entered order (Firm fee order) (.2); conf with TM, review attorney claims and proposed settlement statements (.6)	450.00	0.80	360.00
	LSJ	Review and calendar Court's Notice of Hearing on objection to transfer of Mays claim to Red Shield (7-31-23 hearing), review entered order granting trustee's request to limit reserve for claims 57 and 110	450.00	0.10	45.00
07/07/2023	MDG	Analyzing billing methodologies under Georgia law (Right to Attorney Liens)	325.00	1.00	325.00
	EYW	Conf with Tom re distribution calculations (0.3); communication with AD and MA re wire instructions (0.2); revise claims register (0.6)	200.00	1.10	220.00
	DM	Prepare Motion to Confirm Disbursement	0.00	0.70	0.00
	BD	Prepare general distribution letters for final edits	150.00	0.10	15.00
	LSJ	Conference with TM re action plan on distributions motion (.1) prepare same (1.3)	450.00	1.40	630.00
	LSJ	Review Stone and Baxter withdrawal as counsel for Power Financial (.1)	0.00	0.10	0.00
07/10/2023	DM	Edit creditor letters (Bain)	200.00	0.30	60.00
	BD	Prepare, print, and edit all distribution letters (1.3)	150.00	1.30	195.00
	LSJ	Conference with TM re settlement (Akemon and Gabbe) and documentation of same (.2); further conf with TM re settlement of attorney fee claims (.1)	450.00	0.30	135.00
07/11/2023	TJV	Finalize and upload order granting motion to disallow transfers	200.00	0.10	20.00
	DM	Prepare creditor letters (Bain)	200.00	0.30	60.00
	BD	Prepare and edit final distribution letters (0.5)	150.00	0.50	75.00
	BD	Review and edit Bain distribution letters (0.5)	150.00	0.50	75.00
	LSJ	Conference with TM, prepare memorandum, email confirming			

Galardi Liquidating Trust

Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
		terms of distributions and consent of Plaintiff attorneys in Bain action to reserve for payment of contingency fee disputes split	450.00	0.80	360.00
07/12/2023	DM	Mail out distribution letters	200.00	0.70	140.00
	BD	Correspondence with Mutepe Akemon re: his clients' distribution letters (0.3)	150.00	0.30	45.00
	BD	Prepare, print, edit, update letters for distribution (1.6)	150.00	1.60	240.00
	LSJ	Email exchange/ review conf with T, (finalization of terms between Plaintiff counsel in the Bain case for purposes of initial distribution) (.3); conf with TM re settlement statement and funding (distribution and legal logistics) (.3)	450.00	0.60	270.00
	LSJ	Prepare re distributions (conf with TM)	450.00	0.10	45.00
07/13/2023	DM	Mail out distribution	200.00	0.70	140.00
	BD	Prepare distribution letters, correspond with creditors and co-counsel re: letters, mail out letters, mail out checks, acquire and confirm wire information from creditors via email and by phone (6.5)	150.00	6.50	975.00
	LSJ	Conference with TM re distributions and objection to Gabbe claim (.1); review debtor objection to Gabbe claim (.1); conf with TM re distributions (review Richards Law Group), telephone conference with M. Akemon (.3)	450.00	0.50	225.00
07/14/2023	BD	Prepare distribution letters, edit letters, correspond with creditors and co-counsel re: letters, mail out letters, mail out checks, acquire and confirm wire information with creditors via email and by phone.	150.00	7.00	1,050.00
	LSJ	Review and analysis of response brief of Christopher Kosachuk as assignee of Shakir Willaims (per trustee claim objection), review filed agreement to transfer same claim (.3); review Jammie Parker's brief in opposition to Trustee's claim objection on res judicata (.1)	450.00	0.40	180.00
	LSJ	Conference with TM re disputed claims, attorney liens, Red Shield interlope and strategy for interpleader (.4); conf with TM re disbursements and escrow (.2)	450.00	0.60	270.00
07/15/2023	LSJ	Review debtor's objection to Gabbe claim filed by Chris Terry, calendar hearing on same	450.00	0.20	90.00
	LSJ	Review BK Court's entered order granting Trustee's objection to the transfer of claims no 114, 115, and 106, review clerk's record entered on name change on claims (.2)	450.00	0.20	90.00
07/17/2023	DM	Mail out checks	200.00	0.30	60.00
	BD	Prepare distribution letters, edit letters, correspond with creditors and co-counsel re: letters, mail out letters, mail out checks, acquire and confirm wire information with creditors via email and by phone.	150.00	6.80	1,020.00
07/18/2023	TJV	Prepare motion to disallow transfer of claim no. 98 (.3); revise/finalize reply and motion (.4); file and serve same (.1)	200.00	0.80	160.00
	DM	Mail out checks	200.00	0.40	80.00
	BD	Prepare distribution letters, edit letters, correspond with creditors and co-counsel re: letters, mail out letters, mail out checks,			

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

Account No: 2345.007

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			Rate	Hours	
		acquire and confirm wire information with creditors via email and by phone.	150.00	7.00	1,050.00
	LSJ	Revise Trustee's Reply Brief in Opposition to Claims of Parker, Williams, and Johnson, research re same	450.00	0.40	180.00
	LSJ	Further review and edits Trustee's Reply Brief in Support of Objection to Claims 95, 98, 99, review objections to transfers of claims	450.00	0.20	90.00
	AEE	Research case support for Reply Brief	325.00	1.50	487.50
07/19/2023	DM	Prepare mail out checks	200.00	0.20	40.00
	BD	Confirm creditors' wire information and follow up re: signing distribution letters with creditors (3.5)	150.00	3.50	525.00
07/21/2023	LSJ	Review debtor's MORs	450.00	0.10	45.00
07/24/2023	BD	Correspondence with Brittney Gregory, confirm address, number, and wiring information, redraft distribution letter, resend letter, correspondence with Gregory re: same (0.8)	150.00	0.80	120.00
07/25/2023	DM	Prepare and send out fedex - distributions	0.00	0.10	0.00
07/26/2023	AEE	Research for Interpleader Complaint	325.00	0.40	130.00
	LSJ	Conference with tm, Prepare correspondence to Red Shield re their allegations	450.00	0.40	180.00
	LSJ	Review entered order disallowing claims of Jocelyn Johnson and Jammie Parker	450.00	0.10	45.00
07/27/2023	AEE	Preparing Interpleader Complaint (Jenisee Long Claim)	325.00	3.40	1,105.00
	AEE	Research on Interpleader Actions	325.00	1.20	390.00
	EYW	Prepare trustee report and continued reconciliation of distribution records	200.00	4.00	800.00
07/28/2023	AEE	Preparing Motion to Grant Interpleader	325.00	1.50	487.50
	TJV	Prepare Notice of Hearing on motion to disallow Williams claim transfer (.1); revise interpleader complaint and compile exhibits (.3); further revisions to complaint (.4); finalize and file same (.3)	200.00	1.10	220.00
	LSJ	Review interpleader A.P. (TM V Long, Dudley and Gabbe)	450.00	0.20	90.00
07/31/2023	AEE	Research and Preparing Motion for Interpleader	325.00	0.90	292.50
08/01/2023	TJV	Prepare and file requests to clerk to issue summons	200.00	0.30	60.00
	EYW	Review and reconcile liquidating trustee bank account and claims register	200.00	2.00	400.00
	LSJ	Conference with TM re estate administration matter (insurance coverage)	450.00	0.10	45.00
08/02/2023	EYW	Research K. Wright disbursement and reissue	200.00	0.30	60.00
	LSJ	Review filed A.P. (Long Interpleader), Summons request, calendar pre-trial conference (.2); review Tiffany Thompson notice of bar complaint (.2); review and calendar Trustee's objection to transfer of claim 98 (.1); review and calendar Trustee's objection to Red Shield claim no. 110 (.1)	450.00	0.60	270.00

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

Account No: 2345.007

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			Rate	Hours	
08/04/2023	TJV	Revise Notice of Hearing on motion to disallow transfer of Williams claim (.1); finalize and file same (.1); revise/finalize objection to claim no 110 (RSF) (.3); finalize and file same (.1)	200.00	0.60	120.00
08/07/2023	TJV	Prepare service of interpleader complaint and summons and file certificate of service re same	200.00	0.40	80.00
08/08/2023	AEE	Preparing Motion to Deposit Funds into the Court Registry	325.00	0.50	162.50
	LSJ	Review objections to Red Shield Proof of Claim's filed by Orenstein for Gabbe	450.00	0.20	90.00
08/10/2023	AEE	Reviewing Jammie Parker's Notice of Appeal, Objection to Claim, and Order Disallowing Claim and Researching Bankruptcy Appeal Rules	325.00	1.00	325.00
	LSJ	Review Taylor-Owens email on appeal, conf with TM re same	450.00	0.10	45.00
08/11/2023	DM	Edits to Response to Creditor filing of Bar Complaint, file and serve	200.00	1.60	320.00
	LSJ	Prepare Response to creditor Thompson Bar Complaint (1.0); review Jamie Parker Motion to Reconsider Order Disallowing Claim, calendar response, review Jamie Parker appeal notice and docketing, calendar events (.5); review and calendar Astrid Gabbe objection to claim of Alexis King (.2)	450.00	1.70	765.00
08/12/2023	LSJ	Review docket and filed Declaration of Trustee (TM) in response to Creditor's Filing Complaint	450.00	0.10	45.00
	LSJ	Review appeal docket (M.D.Ga), prepare Notice of Appearance for LSJ	450.00	0.10	45.00
08/14/2023	LSJ	Prepare request for transcript (.1); prepare Notice of Appearance in USDC (appeal pending) (.1)	450.00	0.20	90.00
	DM	Prepare Notice of Appearance for LJ as attorney for TM (Parker appeal)	200.00	0.20	40.00
	LSJ	Prepare request for transcript	450.00	0.10	45.00
08/15/2023	LSJ	Review and calendar hearing (Jamie Parker Motion to Reconsider)	450.00	0.10	45.00
08/17/2023	BD	Correspondence to Jackie Galardi Torres via phone call and email re: Distribution Letter (0.2)	150.00	0.20	30.00
08/18/2023	LSJ	Review Shakir Williams response to Motion to Disallow Claim Transfer and calendar hearing	450.00	0.20	90.00
08/21/2023	LSJ	Review and calendar Kosachuck's MRAS	450.00	0.10	45.00
08/22/2023	EYW	Reconcile liquidating trustee account; process expense payments	200.00	0.40	80.00
08/23/2023	TJV	Revise interpleader deposit motion (.1); prepare Notice of Hearing on same (.1)	200.00	0.20	40.00
	BD	Draft Objection to Claim No. 107 for Jackie Galardi Torres (0.2)	150.00	0.20	30.00
	LSJ	Prepare designation of record and issues on appeal (.1); review			

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			Rate	Hours	
		and calendar hearing re-set on Proof of Claim objections (.1)	450.00	0.20	90.00
08/24/2023	TJV	Finalize, file and serve interpleader deposit motion	200.00	0.30	60.00
	LSJ	Review and prepare TM's Motion to Interpleader (Long A.P)	450.00	0.10	45.00
08/25/2023	AEE	Research re motion to reconsider standard (Parker, Jamie)	325.00	0.20	65.00
	AEE	Preparing Response in Opposition to Jammie Parker's Motion for Reconsideration	325.00	0.50	162.50
08/26/2023	LSJ	Review and calendar TM objection to J. Galardi Torres claim/ lack of W9 (.1); review Jenisee Long Motion to Dismiss (intervenor A.P.) (.2)	450.00	0.30	135.00
08/28/2023	LSJ	Conference with TM re default and foreclosure (Debtor Plan)(.4); conf with TM re subpoena from Gabbe to Trustee (.1); review plan provisions re defaults (.1); conf with Trustee re status and pending issues (.1)	450.00	0.70	315.00
	EJB	Draft Forbearance Agreement (1.9)	395.00	1.90	750.50
	TJV	Prepare notice of sale and foreclosure letter (.7); review lien records (no FTLs) (.1); prepare notices of sale and foreclosure letters for two remaining properties (.9)	200.00	1.70	340.00
	LSJ	Review Red Shield's Response to Objection (Proof of Claim 110)	450.00	0.10	45.00
08/29/2023	MDG	Drafting and revising reply in support of motion to disallow transfer of Claim 98.	325.00	3.70	1,202.50
	TJV	Finalize and file motion to enter forbearance agreement and motion for ex parte order granting same (.4); finalize and file certificate re expedited hearing and upload ex parte order (.1)	200.00	0.50	100.00
	LSJ	Review Kosachuck's Notice of Hearing on MRAS, calendar same (.1); review and calendar Gabbe objection to Proof of Claim 38 (.1); review and calendar Gabbe objections to Proof of Claim 116, 106, 114, 103, 118, 117, 40, 39 (.2)	450.00	0.40	180.00
08/30/2023	AEE	Researching legal standard for Response in Opposition to Motion to Reconsider	325.00	0.70	227.50
	AEE	Researching disallowance of duplicative proofs of claim	325.00	0.50	162.50
	EYW	Conference with TM re status of repair reimbursements (0.2); process multiple reimbursement checks and ledger maintenance (0.5)	200.00	0.70	140.00
	TJV	Finalize, file and serve reply re Williams claim transfer (.3); prepare accountant fee app (.5); prepare J&W fee app (trustee attys) (.4)	200.00	1.20	240.00
08/31/2023	AEE	Researching whether Rule 9006(a) applies to claim objection bar date	325.00	0.40	130.00
	TJV	Revise response to Parker motion for reconsideration	200.00	0.10	20.00
	AEE	Researching 9006(a) and late filed claims	325.00	0.70	227.50
	BD	Prepare, file, and serve Response with Opposition to Jammie Parker (0.2)	150.00	0.20	30.00
	LSJ	Review TM Response to Motion for Reconsideration (.1); review and calendar Notice of Hearing setting on Parker (Motion for Reconsideration) (.1); review clerk docket notice re interpleader responses (.1); review and calendar Notice of Appearance on			

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			Rate	Hours	
		Long's Motion to Dismiss (A.P.) (.1); review TM's Reply Brief in Support of Motion to Disallow Proof of Claim 98 (.1); review / prepare Motion for Forbearance with Galardi (.1); review entered order on same (.1)	450.00	0.70	315.00
09/01/2023	AEE	Researching whether Liquidating Trustee has exclusive right to object to claims	325.00	1.30	422.50
	AEE	Preparing Report of Rule 26(f) Conference	325.00	0.50	162.50
09/05/2023	LSJ	Conference with TM re strategy and pro se litigants practicing	450.00	0.70	315.00
	LSJ	Review Dudley answer to Interpleader (.1); review and calendar Notice of Hearing (re TM's objections to claims) (.1)	450.00	0.20	90.00
09/06/2023	TJV	Email exchange court re filing and file hearing transcript (.1); prepare fee app for Liquidating Trustee (.5); finalize, file and serve appellee's designation of record on appeal (.1); finalize and upload order striking Williams claim transfer (.1)	200.00	0.80	160.00
09/07/2023	LSJ	Analysis of various claims by attorneys for fees and liens on claims; conf with TM re same	450.00	0.50	225.00
	LSJ	Conference with TM re strategy	450.00	0.20	90.00
	LSJ	Review Kosachuck Motion to Continue (objection to claim transfer), review Kosachuck Notice of Appearance	450.00	0.20	90.00
09/08/2023	BLS	Conf. w/ TM re research on defamation, trusts, and filing under a false name	250.00	0.10	25.00
	BLS	research on defamation per se and the single instance rule; conf, w/ TM re: research	250.00	1.30	325.00
	BLS	research trustee-beneficiaries in GA	250.00	0.50	125.00
	BLS	Research filing court documents under a false name and other similar crimes; conf. w/ Tom re: research	250.00	1.30	325.00
	LSJ	Conference with TM re respond and demand (Red Shield) re allegations (.2); conf with TM re strategy and interpleader (.9); review multiple claim objections and allegations on same, review interpleader and develop strategy (.5)	450.00	1.60	720.00
	LSJ	Review entered order (denial of Red Shield request to continue hearing) (.1); review Gabbe Response filed re Proof of Claim 110 claim objection (.1); review docket entries by Court re hearing, calendar hearing resets (Motion to Reconsider and claim objection) (.1); review designation of record on appeal and statement of issues (.1)	450.00	0.40	180.00
09/10/2023	LSJ	Review Red Shield Response to Objection to Proof of Claim 110	450.00	0.10	45.00
09/11/2023	LSJ	Review entered order affirming Trustee's objection to Assignment of Shakir Williams claim to Chris Kosachuk	450.00	0.10	45.00
09/13/2023	EYW	Bank account reconciliation	200.00	0.50	100.00
	DM	Compare two Motion to Dismiss for TM's Response	200.00	0.10	20.00
	LSJ	Prepare and calendar Notice of Hearing on Motion to Disallow Transfer (Proof of Claim 98)	450.00	0.10	45.00
09/14/2023	DM	Edits on Letter to Red Shield Funding; prepare fedex and serve			

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			Rate	Hours	
		and email	200.00	0.90	180.00
	LSJ	Prepare correspondence to Red Shield rep (practicing law but not an attorney) re his false statements (.6); review and calendar appeal deadlines (.1); conf with TM re all (.1); revise and finalize response letter to 3rd party inquiry (.2)	450.00	1.00	450.00
	LSJ	Review USDC docket and notice of receipt of appeal record re Jammie Parker appeal, confirm and calendar deadlines	450.00	0.20	90.00
	LSJ	Review docket (hearing set on Gabbe opposition, calendar same)	450.00	0.10	45.00
09/18/2023	TJV	Prepare payoff letter (.5); revise/finalize same (.2)	200.00	0.70	140.00
	LSJ	Review Jenisee Long Response to Interpleader	450.00	0.10	45.00
09/19/2023	LSJ	Prepare Response to Jenise Long's Motion to Dismiss the Interpleader A.P.	450.00	1.60	720.00
09/20/2023	DM	Edits on Response to Long's Motion to Dismiss	200.00	0.80	160.00
	LSJ	Revisions on Response Brief (Motion to Dismiss Interpleader A.P.)	450.00	0.50	225.00
09/21/2023	DM	Finalize Response to Long's Motion to Dismiss; file and serve	200.00	0.30	60.00
	LSJ	Final review/ filing of Response to Motion to Dismiss on Interpleader A.P. (.1); conf with TM re resolution of same (.1)	450.00	0.20	90.00
	LSJ	Review / prepare response to Long's Motion to Dismiss (A.P.)	450.00	0.10	45.00
09/25/2023	LSJ	Prepare and attend hearing on interpleader	450.00	1.00	450.00
09/26/2023	LSJ	Prepare withdrawal (objection to Proof of Claim 107), conference with TM (.1); Review and calendar entered order in Long A.P. (setting Defendant deadlines for response) (.1)	450.00	0.20	90.00
09/29/2023	TJV	Prepare satisfactions of Class 8 DSDs	200.00	0.20	40.00
	LSJ	Review status of payment and settlement with Galardi under the Plan	450.00	0.10	45.00
10/02/2023	LSJ	Review trust and cash requirements re professional compensation	450.00	0.10	45.00
10/03/2023	LSJ	Conference with TM re interpleader in Fla. (settlement and litigation costs)	450.00	0.30	135.00
	TJV	Revise/finalize Trust DSD cancellations	200.00	0.10	20.00
10/04/2023	TJV	File DSD cancellations for e-recording (Fulton & DeKalb)	200.00	0.20	40.00
	BD	Prepare, edit, and file King Status Report and Order (0.5)	150.00	0.50	75.00
10/05/2023	BD	Zoom meeting re: Rasheedah Mays settlement agreement (0.7)	150.00	0.70	105.00
	BD	Prepare and file Notice of Hearing for Shakir Williams claim objection (0.3)	150.00	0.30	45.00
10/06/2023	MDG	Reviewing issues surrounding parallel litigation in Florida district court and revising emergency motion.	325.00	3.90	1,267.50
	DM	Edits on Emergency Motion	200.00	0.40	80.00
	LSJ	Conference with TM, review emails re Gabbe post-petition taking			

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Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
		of a consent judgment against her client King without authorization (.4); review/ prepare motion re disbursements (.2); conference with TM (.2); prepare of motion to enjoin Gabbe and related relief, conference with TM re same and research re same (1.4)	450.00	2.20	990.00
	LSJ	Email exchange with chambers (review) re scheduling hearing	450.00	0.10	45.00
10/09/2023	MDG	Analyzing issues surrounding stay violations and the offending creditor's proof of claim.	325.00	0.90	292.50
	LSJ	Conference with TM re interpleader settlement and strategy (.3); review emails (Chris Kosachuk, Gabbe, TM) (.2)	450.00	0.50	225.00
10/10/2023	LSJ	Multiple telephone conferences with TM re strategy and resolution of interpleader	450.00	0.20	90.00
10/11/2023	LSJ	Review email from Kosachuk, conference with TM re same (.3); review all pleadings and Proof of Claim related to Alexis King claim (including impermissible claim amendment) and conference with with TM re strategy (1.1); research re fake claim (.1); conference with TM (trial prep and exam prep for emergency hearing) (.5)	450.00	2.00	900.00
	BD	Prepare, draft, file and serve Motion for Contempt on Astrid E. Gabbe (1.2)	150.00	1.20	180.00
10/12/2023	BLS	conf. w/ TM re: research on unauthorized practice of law and court authority	250.00	0.30	75.00
	BLS	research motions to restrict future court filings in BK cases; print cases for TM and file them for trial	250.00	2.30	575.00
	BLS	conference w/ TM to discuss research results	250.00	0.20	50.00
	EYW	Process expense checks and reconcile accounts (0.3)	200.00	0.30	60.00
	BLS	research sanctions for violation of court orders; conf. w/ TM	250.00	2.20	550.00
	BLS	Research sanctions for disobeying a court order and federal rules of evidence applying to contested matters / sequestration	250.00	2.10	525.00
	LSJ	Review emails and communique from Gabbe (re threats for criminal conversion based on distributions) (.3); further hearing prep (.2)	450.00	0.50	225.00
	TJV	Run people search and prepare subpoena to Alexis King (.2); finalize subpoena and coordinate with process server re service of same (.2)	200.00	0.40	80.00
	BD	Prepare exhibit binders and review exhibits with TTM (2.5)	150.00	2.50	375.00
	BD	Serve Certificate of service and Order re: expediting hearing	150.00	0.50	75.00
10/13/2023	MSC	Prepare 10/16 trial exhibits	200.00	0.80	160.00
	TJV	Prepare trial exhibits & binders	200.00	1.60	320.00
	BD	Prepare exhibit list, binders, pull emails for exhibits, and review with TTM (3.0)	150.00	3.00	450.00
10/14/2023	BD	Prepare for trial with TTM (2.5)	150.00	2.50	375.00
10/15/2023	LSJ	Review and prepare examinations and hearing exhibits prep for trial	450.00	7.00	3,150.00
10/16/2023	BLS	research sequestration and who is a party to a contested matter	250.00	1.00	250.00

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			Rate	Hours	
	EYW	Telephone call with TM re AG distributions	200.00	0.10	20.00
	DM	Finalize exhibit binders, prepare table of contents for binders	200.00	0.70	140.00
	LSJ	Multiple conferences with TM (trial prep) (.7); trial prep (.1); prepare and attend trial on Motion for Stay Violation (including travel to Macon) (8.5)	450.00	9.30	4,185.00
	BD	Trial preparation (2.0)	150.00	2.00	300.00
	BD	Attend trial in Macon (3.2)	150.00	3.20	480.00
10/17/2023	LSJ	Conference with TM (.1); post-trial debriefing and strategy (.1); review Astrid Gabbe's demand re Mayfield fees (.1); further review of multiple demands (accusations by Gabbe) (.1)	450.00	0.40	180.00
	BD	Prepare and draft distribution letter for Tiffany Thompson (0.6)	150.00	0.60	90.00
10/18/2023	MLM	Discussing research project with TTM	250.00	0.10	25.00
	MLM	Researching court approval for amendment of claims	250.00	1.10	275.00
	MLM	Researching signature requirements	250.00	1.10	275.00
	LSJ	Conference with TM re pending action items: TRO and A.P. (.4); and objections to claims (.3)	450.00	0.70	315.00
10/19/2023	MDG	Drafting, revising, compiling, and filing notices of bankruptcy for Milner and Darden district court cases.	325.00	4.00	1,300.00
	TJV	Prepare and send correspondence to FL USDC clerk re filing Notices of Bankruptcy in Darden & Milner actions (TM as trustee, pro se)	200.00	0.50	100.00
	LSJ	Multiple email exchange with counsel and creditor Mays re resolution of interpleader (.1); review and calendar stip filed by Dudley and Gabbe re responsive pleadings on Gabbe claim objections (.1); conference with TM re interpleader (.1); prepare Notice of BK for filing in District Court actions (.7)	450.00	1.00	450.00
10/20/2023	MDG	Preparing adversary proceeding complaint for stay violation.	325.00	1.40	455.00
	LSJ	Review Kosachuck threatening email/demand for withdrawal of motion for contempt (.1); review Kosachuck email to A. King and Guernsey (sending a motion for sanctions by Gabbe and Kosachuck against King and Guernsey (.1); conference with MG re Kosachuck threats (.1)	450.00	0.30	135.00
	LSJ	Email exchange debtor counsel (McBryan) re Gabbe pleadings	450.00	0.10	45.00
10/22/2023	LSJ	Emails from Mays (Canada Imani) and Kosachuk (.2); email exchange/ review re order(s) for disbursement and creditor inquiry (.1); review analysis re Kosachuk allegations/threats/demands (.1)	450.00	0.40	180.00
10/23/2023	MDG	Drafting and revising adversary proceeding complaint for stay violations.	325.00	4.30	1,397.50
	LSJ	Prepare adversary for contempt and to enjoin stay violations (.1); prepare objection to assignment of claim to Kosachuk (.1); review S.D. Fla pleadings and order vacating order (against Long presented by Gabbe) (.1)	450.00	0.30	135.00
10/24/2023	EYW	Review trustee report and wire transfers	200.00	0.20	40.00
	TJV	Revise motions to disallow transfers of claims 98 & 57 and motion for expedited hearing (.5); revise/finalize, file and serve			

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			Rate	Hours	
		same (.5)	200.00	1.00	200.00
	MDG	Reviewing issues surrounding the authority of the bankruptcy court to enjoin litigants in a separate proceeding that is in violation of the automatic stay.	325.00	1.10	357.50
	LSJ	Review J. Cannon order to S.D.Fla Interpleader Action and emails re same (order re Mays Response stricken), review J. Cannon order for liquidating trustee to pay funds into the interpleader court registry, review Court's order dismissing Thompson, multiple conferences with TM re strategy and compliance re same (.5); review separate proceeding no. 23-508 (.3); conference with TM re distributions (.4)	450.00	1.20	540.00
10/25/2023	EYW	Prepare trustee report	200.00	3.00	600.00
	MDG	Revising motion for temporary injunction and reviewing Barton doctrine issues.	325.00	2.20	715.00
	LSJ	Conference with TM (.3); email exchanges and conference with TM re Mayfield claim and Gabbe request for distribution (.2)	450.00	0.50	225.00
	TJV	Prepare Notice of Hearing on motions to disallow claim transfers (.1); finalize, file and serve Notice of Hearing (.2); revise/finalize and file status report (.1)	200.00	0.40	80.00
10/26/2023	EYW	Review and revise claims ledger	200.00	0.80	160.00
	LSJ	Review order entered dismissing appeal (by USDC judge self) (Jamie Parker matter), review appellants Motion to Stay Proceeding filed by Jason Brenstein and USDC judgment closing appeal	450.00	0.20	90.00
	TJV	Finalize 2nd trustee report and email same to UST	200.00	0.40	80.00
10/27/2023	BD	Conference with TTM re: Astrid Gabbe settlement (0.7)	150.00	0.70	105.00
10/28/2023	LSJ	Telephone conference with Gabbe, TM re pending issues and resolution options, conference with TM, prepare for same	450.00	1.10	495.00
10/30/2023	LSJ	Conference with TM re all pending claim objections and plan to resolve disputes between Gabbe and Dudley (White Board all claim disputes) (1.0); review emails (Kosachuck et al re terms (.1); telephone conference with Gabbe, Kosachuck, Jason Orenstein and TM re agenda items (.6); telephone conference with A. Dudley (.2); telephone conference with Dudley re same (.5); conference with TM analysis of strategy to resolve all remaining disputes, telephone conference with Dudley re proposals (1.2)	450.00	3.60	1,620.00
10/31/2023	BLS	find statute and case on trustee as a beneficiary for TM	250.00	0.10	25.00
	LSJ	Review/ prepare term sheet, conference with TM (.4); conference with TM re continuing negotiations (.1); conference with TM re Mayes claim (.1); conference with TM (.2); prepare for hearing, review all pleadings set to be heard (.1)	450.00	0.90	405.00
	LSJ	Review Rashid Mays request to continue stay enforcement (.1); review and calendar Notice of Hearing on Proof of Claim by Mays (.1)	450.00	0.20	90.00
11/01/2023	LSJ	Travel to and from Macon, attend hearing and extended			

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			Rate	Hours	
		settlement discussions with all parties	450.00	9.50	4,275.00
11/06/2023	LSJ	Prepare Settlement Agreement	450.00	1.50	675.00
11/07/2023	EYW	Process tax payment and update ledger	200.00	0.20	40.00
	LSJ	Revise Settlement Agreement with Gabbe/Kosachuck, conference with TM re same (.8); review email exchange (Chris Terry and Michael DeCampo dba Red Shield) (.2); review TM email to Dudley and Orenstein (.2)	450.00	1.20	540.00
11/09/2023	LSJ	Email exchanges TM and Kosachuck (.1); revise Settlement Agreement (.4)	450.00	0.50	225.00
	LSJ	Review Chris Terry email to Red Shield re it assertions	450.00	0.10	45.00
	LSJ	Review email exchanges (Kosachuk) re settlement agreement	450.00	0.10	45.00
11/10/2023	LSJ	Review and calendar Notice of Hearing re-set on Gabbe MRAS (to 12-8-23) (.1); review Court docket notice re hearing settlement (.1); review Red Shield Fund's request for order (.1); review and calendar Red Shield Motion in Long A.P. (.1)	450.00	0.40	180.00
11/13/2023	LSJ	Review email exchange with Gabbe and Akemon re Mays representation and Fla Bar	450.00	0.10	45.00
11/15/2023	LSJ	Conference with TM re communique to creditor body (.1); conference with TM re status of settlement and strategy (.1)	450.00	0.20	90.00
11/16/2023	LSJ	Prepare completion of settlement agreement (recalcitrant parties on resolving written terms)	450.00	0.20	90.00
11/17/2023	LSJ	Conference with TM re settlement comments to Dudley (.1); further conference with TM re same (.2)	450.00	0.30	135.00
11/18/2023	LSJ	Email exchange / review Red Shield and Kosachuk allegations and positions re settlement	450.00	0.20	90.00
11/20/2023	LSJ	Conference with TM re terms	450.00	0.10	45.00
11/21/2023	LSJ	Telephone conference with Dudley, telephone conference with Orenstein and Kosachuck, conference with TM (re solution of pending items on settlement agreement) (.8); email exchange all counsel re scheduling on furtherance of same (.1)	450.00	0.90	405.00
11/22/2023	DM	Prepare matrix for mailing	200.00	0.50	100.00
	LSJ	Conference with TM, call Orenstein (.1); prepare Settlement Agreement (.3); conference with TM re same (0.1); email exchanges with all counsel re same (.1); conference call Kosachuck, Dudley, Orenstein, and TM, revise Settlement document (1.3); further calls and conference with all same re term (1.1)	450.00	3.00	1,350.00
	TJV	Prepare Notice of Hearing on settlement motion (.1); revise/finalize motion (.1); prepare response brief in Long adversary per court order (.4)	200.00	0.60	120.00

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			Rate	Hours	
11/27/2023	MSC	Finalize and file motion to expedite and upload order granting same	200.00	0.30	60.00
	DM	Edits to lettter to beneficiaries, mail out, serve	200.00	3.30	660.00
	LSJ	Review Red Shield Funding emails re distributions, conference with TM (.2); email exchange, review re settlement (.1); conference with TM re admin/fees of Trust (.1); prepare correspondence to creditors re distribution (.4); telephone conference with Guernsey (Red Shield) re settlement (.3); email review (Red Shield) re settlement (.1)	450.00	1.20	540.00
11/28/2023	MSC	Finalize and upload settlement agreement order with chamber's edits	200.00	0.10	20.00
	BLS	research liability of Trust for USTs fees	250.00	0.60	150.00
11/29/2023	BLS	conf w/ TM re: research project; research underground storage tank issues	250.00	0.70	175.00
	DM	Prepare and file coa for JLL	200.00	0.20	40.00
	BD	Update creditors emails and review mailing addresses (0.4)	150.00	0.40	60.00
	BD	Prepare Certificate of service on Order (DN 667) Motion to Shorten Time (0.5)	150.00	0.50	75.00
11/30/2023	BD	Prepare and serve on the matrix Certificate of service for Order (DN 667) Motion to Shorten Time (3.0)	150.00	3.00	450.00
12/01/2023	BLS	conf. w/ TM re: motion to remove trustee	250.00	0.30	75.00
	BLS	conf. w/ TM re: objection to motion	250.00	0.30	75.00
	BLS	drafting objection to Motion to Remove (4.1)	250.00	6.20	1,550.00
	LSJ	Conference with TM re Red Shield emails and his contact with Court requesting hearing on removal (.2); conference with BS and TM and calls to Red Shield (Guernsey) (re settlement) (.3); email exchange with Red Shield re same (.1)	450.00	0.60	270.00
12/04/2023	LSJ	Conference with TM and Guernsey / De Campo re resolution of objection to settlement (.5); conference with TM re same (0.1); conference with TM re Red Shield Complaint and strategy re same for hearing (1.0)	450.00	1.60	720.00
12/05/2023	LSJ	Conference with TM re resolution of Red Shield objections (.1); telephone conference with Guernsey and DeCampo, telephone conference with Orenstein (effort to resolve Red Shield action against settlement) (.9)	450.00	1.00	450.00
12/06/2023	AEE	Researching interpleader complaints	325.00	1.80	585.00
	TJV	Revise/finalize accountant fee application	200.00	0.50	100.00
	LSJ	Telephone conference with Orenstein and Kosachuck (re Florida Interpleader resolution and Red Shield counterclaim) and conference with TM re same (.5); call and email (return) to Red Shield (.1); telephone conference with Guersey and De Campo re their apparent objection to settlement agreement (subjecting TM to profanity and personal attacks), conference with TM re same (.3)	450.00	0.90	405.00
	LSJ	Review Red Shield emails and filings (.1); call with TM (prepare			

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

Account No: 2345.007

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			Rate	Hours	
		for call with Kosachuk/ Gabbe and results of today's hearing in USDC (S.D.Fla.) (.3); telephone conference with Gabbe, Kosachuk, Orenstein, and TM re S.D.Fla. hearing and settlement (.4)	450.00	0.80	360.00
12/09/2023	LSJ	Telephone conference with TM re Mutepe Objection to Settlement (for Claimant Mays)	450.00	0.20	90.00
12/10/2023	LSJ	Telephone conference with TM re strategy on resolution of conflicting Gabbe and Red Shield claims (.6); email review (.1)	450.00	0.70	315.00
12/12/2023	LSJ	Conference with TM re strategy	450.00	0.20	90.00
12/13/2023	TJV	Finalize and file stipulation extending Akemon response deadline to settlement motion	200.00	0.10	20.00
	LSJ	Telephone conference with TM and Jason Orenstein re Gabbe deposition by Mutepe Akemon (.2); review Astrid Gabbe emails re Mays (and Mutepe deposition) (.1); conference with TM re Dudley comments on current disputes (.1); conference with TM re Akemon objection extension (.1)	450.00	0.50	225.00
	LSJ	Further review emails Gabbe (Kosachuck) and Akemon re discovery disputes and settlement objections (.2); conference with TM re strategy (.1)	450.00	0.30	135.00
12/14/2023	LSJ	Telephone conference with Orenstein and Kosachuck re pending Motion for Settlement Resolution of Objections to same (strategy and terms) (.4); conference with TM re Florida Interpleader counsel (.2); further conference with TM (.1); further conference with TM re Red Shield Proposal (.1); receipt and review of Red Shield email proposal re distribution on claim 110, conference with TM re same, forward email proposal to Orenstein and Kosachuck (.2); telephone conference with Orenstein re Red Shield Proposal (terms) (.2); review correspondence from Scott Lasseter re Frontage Road Property assessment, conference with TM re same (.4); telephone conference with Orenstein (.3); telephone conference with Mutepe Akemon re objection to Settlement Agreement by Long and Mays (.3)	450.00	2.20	990.00
12/15/2023	TJV	Revise/finalize accountant fee application (.2); finalize, file and serve same (.4)	200.00	0.60	120.00
	LSJ	Conference with TM; prep for hearing on settlement agreement (.2); review objections to settlement agreement filed by (a) Mays/Long and (b) by Red Shield (.5); telephone conference with Orenstein and Kosachuck re same and prep consent order to resolve Akemon objection re Mays and Long (.4); conference with TM and prep proposed consent order on Akemon objection (.7); conference with TM (.1); prepare order resolving Red Shield claim; email to Red Shield and Guernsey re same (.5); conference with TM re order/resolution of Akemon objection (.1); call DeCampo/Red Shield and email same (.1)	450.00	2.60	1,170.00
12/16/2023	LSJ	Emails and multiple telephone conferences with Mutepe Akemon re settlement and objection (.4); conference with TM re			

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
		settlement and emails re same (.4)	450.00	0.80	360.00
12/17/2023	LSJ	Review pleadings and prep for hearing	450.00	1.20	540.00
12/18/2023	LSJ	Travel to and from Macon; attend hearing on settlement (7.5); prepare and revise settlement approval order (1.2)	450.00	8.70	3,915.00
12/19/2023	LSJ	Return call to Mr. Guernsey (.1); telephone conference with Guernsey and re their concerns about the settlement agreement (.4); conference with TM re communicate with counsel and email exchanges re approval of order (.1); review Red Shield emails (.1); telephone conference with Mutepe Akemon re Claim and resolving objections by Red Shield (to order) (.4)	450.00	1.10	495.00
	LSJ	Further telephone conference with Akemon re Red Shield review of order approving settlement (.3); telephone conference with DeCampo, Guernsey and Akemon re Red Shield refusal to sign off on order (.3); conference with TM re Red Shield signature on order and submission of order to Court approval of settlement, telephone conference with Red Shield confirming settlement and wire transfer (.3)	450.00	0.90	405.00
12/20/2023	LSJ	Prepare Stipulation of Dismissal of Adversary and order dismissing Adversary (.4); conference with TM and email exchanges with all counsel re same (.2); further email exchange, review with all counsel and parties re resolutions of Order and Dismissal (.2); conference with TM re same and filing/processing of pleading and Notice of Appearance by Orenstein in A.P. (.1)	450.00	0.90	405.00
	TJV	Finalize and file stipulation for dismissal and upload consent order on same	200.00	0.20	40.00
12/21/2023	EYW	Process trust expenses	200.00	1.00	200.00
	LSJ	Email exchanges (TM and all counsel) re action items on settlement effectuation (.3); conference with TM re Motion to Disburse (.1); conference with TM (same) (.1); further email exchanges and review pleadings re settlement implementation (.1)	450.00	0.60	270.00
	DM	Prepare withdrawals with prejudice and file	200.00	0.90	180.00
	DM	Review Bain case in FL and save Plaintiff's Motion for Summary Judgment for TM	200.00	0.10	20.00
12/22/2023	LSJ	Prepare Motion to Disburse (.4); conference with TM re same (.1)	450.00	0.50	225.00
12/27/2023	LSJ	Review entered order dismissing Gabbe Adversary proceeding	450.00	0.10	45.00
	LSJ	Email exchange with Guernsey re Gabbe filings in Darden case (USDC)	450.00	0.10	45.00
	LSJ	Analysis of action needed before U.S. Magistrate	450.00	0.30	135.00
	LSJ	Conference with TM re disbursement motion (.2); review email from Red Shield and (Motion for Substitution in lieu of King filed in USDC Darden case) filed by Gabbe (Kosachuk), review notice filed by King in Darden (.4)	450.00	0.60	270.00
12/28/2023	TJV	Prepare fee application for KMCL firm (trustee attorneys)	200.00	0.30	60.00

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

Account No: 2345.007

Invoice No: 67954

			Rate	Hours	
	LSJ	Review Gabbe Motion to Amend Settlement Order (.1); review Dudley emails to Orenstein (demands for compliance with settlement agreement (.1); telephone conference with Dudley re Kosachuk (Gabbe) contempt (.3)	450.00	0.50	225.00
01/02/2024	BD	Prepare and edit Motion for Second Distribution (2.0)	150.00	2.00	300.00
	LSJ	Review Red Shield emails re Gabbe violations of Settlement Agreement (.3); prepare Motion to Disburse (.1)	450.00	0.40	180.00
01/03/2024	BD	Review and edit Motion for Second Distribution (2.4)	150.00	2.40	360.00
	LSJ	Review Jamie Parker withdrawal of Motion to Reconsider (which was originally filed on August 9, 2023) (filed by J. Orenstein) (.1); telephone conference with Guernsey re status of settlement (.1); conference with TM re strategy (plan for status report and Motion to Enforce Settlement) (.3)	450.00	0.50	225.00
	LSJ	Prepare Motion to Disburse (2.8); conference with TM re same (.8)	450.00	3.60	1,620.00
	DM	Prepare edits on Motion to Approve Second Distribution to Beneficiaries	200.00	0.70	140.00
01/04/2024	EYW	Review second distribution spreadsheet	200.00	0.20	40.00
	DM	Prepare edits on Motion to Approve Second Distribution to Beneficiaries and Notice of Hearing	200.00	2.00	400.00
	LSJ	Review BK Court order setting hearing on Gabbe Motion to Set Aside Settlement, calendar hearing and objection deadline (.1); review Dudley Motion to Dismiss Dudley from Interpleader and Motion for Contempt (.1); prepare Motion for Comfort Order on Second Distribution, conference with TM re same (1.8); email exchange (review) with chambers re setting hearing (.1); further review of Dudley's Motion to Hold Gabbe in Contempt (.1); telephone conference with Gurensey re Motion to Disburse and his request for immediate payment (.3); conference with TM re same and strategy on setting additional hearings (.2); prepare Notice of Automatic Stay for filing in USDC (Miami) (.1); telephone conference with Akemon and TM re Motion to Disburse (.2); revise Motion to Disburse (conference with TM re same) (.3)	475.00	3.30	1,567.50
	BD	Review Motion for 2nd Distribution and make edits (0.6)	150.00	0.60	90.00
	BD	Confirm creditor contact info in database (0.1)	150.00	0.10	15.00
01/05/2024	BLS	Draft Status Report on Settlement Agreement	300.00	2.30	690.00
	BLS	draft motion to compel	300.00	2.40	720.00
	LSJ	Review emails and comments on Motion to Disburse, revise same (.2); conference with TM re same (.2); prepare status report (.1); prepare Motion to Disburse (revisions and updates) (1.0); email exchanges (all counsel) re Long Interpleader (.1); prepare Status Report (1.3)	475.00	2.90	1,377.50
	LSJ	Telephone conference with TM re settlement with Gabbe per Akemon (.3); conference call with TM and Akemon (prepare report Gabbe withdrawal of pleadings) (.5)	475.00	0.80	380.00
	DM	Edits on Status Report on Settlement Agreement	200.00	0.50	100.00
	TJV	Prepare certificate of service of motion to disburse and status report (.7); revise Notice of Hearing and motion to disburse (.2);			

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Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
		further prep of certificate of service (.3); revise & finalize distribution motion (.3); finalize and file distribution motion (.1); revise certificate of service (.2); finalize and file status report (.1); prepare service of distribution motion and status report and file certificate of service re same (1.0)	200.00	2.90	580.00
	BD	Revise and edit Motion for 2nd distribution (0.6)	150.00	0.60	90.00
	BD	Prepare and mail out Motion for 2nd distribution and status report (0.7)	150.00	0.70	105.00
01/08/2024	BLS	finish drafting motion for contempt and confer w/ TM re: same	300.00	2.20	660.00
	DM	Prepare edits to Motion for Contempt (.6); finalize, file and serve (.5)	200.00	1.10	220.00
	MLM	Discussing research of what constitutes practice of law with TTM	300.00	0.10	30.00
	MLM	Researching what constitutes practice of law in bankruptcy	300.00	0.50	150.00
	LSJ	Review and prepare withdrawals re Gabbe Pleadings (proposed to Gabbe), email re same (Akemon) (.2) conference with TM re Kosachuk designation as 30b6 designee of Gabbe PC and depositions occurring (.1); conference with TM and telephone conference with Red Shield re pending resolution of Red Shield matters (notice to Miami Courts, disbursements and Motion to Compel) (.4); email exchange (Red Shield) re Fla case (stay update) (.2); prepare Motion to Compel (as to Gabbe) (1.5)	475.00	2.40	1,140.00
01/09/2024	TJV	Prepare order granting accountant fee app (.1); finalize and upload same (.1)	200.00	0.20	40.00
	LSJ	Prepare Fee Order (accountants/McNair)	475.00	0.10	47.50
	BD	Begin work on Galardi creditors 1099 excel payment spreadsheet (2.5)	150.00	2.50	375.00
01/10/2024	BD	Review and confirm addresses and payment amounts are correct (1.3)	150.00	1.30	195.00
01/11/2024	DM	Emails re Certificate of service for Ainsworth review	200.00	0.10	20.00
	DM	Prepare supplemental certificate of service for Astrid re Motion for Contempt	200.00	0.30	60.00
	DM	Finalize and file Amended Notice of Hearing on DN 707	200.00	0.10	20.00
	DM	Prepare edits on Motion for Order Determining Payee; edits on Motion for Expedited Hearing on Motion; file both	200.00	1.00	200.00
	DM	Prepare edits on Darden Notice of Continuing BK Stay	200.00	0.40	80.00
	LSJ	Review Proposed Order and email re dismissal of Dudley and Dudley-related claims in the Long Interpleader Action (0.1); prepare Motion to Determine Disbursement of Disputed Attorney Fees (Milner and Williams) (.9); telephone conference with TM re same and Litigation prep for Jan 30 hearings (.2); prepare Notice of Stay for Filing in USDC, Fla. (Darden case) (.6); emails re filing, service and setting hearing on Miller and Williams Disbursement Motion (.2)	475.00	2.00	950.00
	BD	Conference with TTM re 1099 excel spreadsheet (0.1)	150.00	0.10	15.00
	BD	Review and update all creditor names, addresses, and payment amounts (1.3)	150.00	1.30	195.00
01/12/2024	BLS	research waiver of issues on appeal; research non-party standing to appeal in bankruptcy, the person aggrieved			

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

Account No: 2345.007

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			Rate	Hours	
		standard, and the "attend and object" requirement; conf. w/ TM re: research findings	300.00	2.30	690.00
	LSJ	Conference with TM and analysis re Gabbe pending Motion to Amend Settlement Order and strategy for Jan. 30 hearing (.5); email exchange and review re retention of Amy Mayer and filing of Stay Notice in USDC (Fla) (.1)	475.00	0.60	285.00
	BD	Review, update, and finalize 1099 spreadsheet for TTM review (1.0)	150.00	1.00	150.00
	TJV	Prepare certificate of service of motion to determine attorney fee payee, amended Notice of Hearing on motion for contempt, and order for expedited hearing (.1); revise same (.1); prepare service of motion to determine attorney fee payee, amended Notice of Hearing on motion for contempt, and order for expedited hearing and file certificate of service re same (1.3)	200.00	1.50	300.00
01/13/2024	LSJ	Telephone conference with A. Dudley re his Motion for Contempt against Gabbe for her failure to abide by orders	475.00	0.20	95.00
	LSJ	Review filed Motion for Order Determining Payee of Disputed Attorney Fees, review filed Motion for Expedited Hearing on same and entered order on same, calendar hearing and objection deadline	475.00	0.20	95.00
01/15/2024	EYW	Prepare Third Trustee Status Report	200.00	4.00	800.00
	LSJ	Review Dudley's filed Motion for Contempt (as to Gabbe) (.1); conference with TM re tax reporting (.3)	475.00	0.40	190.00
01/16/2024	LSJ	Review email from Red Shield (Civil theft demand issued by Kosachuk purportedly on behalf of Gabbe, demand to Guernsey), analysis re same (.1); review Gabbe's Motion to Strike the Trustee's Notice of Stay (Darden Action, S.D. Fla USDC) (.1)	475.00	0.20	95.00
	LSJ	Conference with TM reviewing status report agenda items and action plan for pleadings and hearing prep	475.00	1.00	475.00
	BD	Review and update 1099 spreadsheet with distribution payment amounts and attorneys fees (4.2)	150.00	4.20	630.00
01/17/2024	BD	Conference with TTM re attorney's fees (0.1) Confirm and update wire amounts for wires sent to attorneys (0.2)	150.00	0.30	45.00
	BD	Prepare and send share link for creditor's W9s (0.1)	150.00	0.10	15.00
	BD	Review and confirm wire transfer information correct for Dudley law firm for Mayfield Proof of Claim 40 (0.1)	150.00	0.10	15.00
	EYW	Continued prep and revisions to Trustee's Third Interim Financial Report	200.00	1.00	200.00
	LSJ	Telephone conference with Red Shield, conference with TM re same (check and letter sent by Gabbe/Kosachuk)	475.00	0.20	95.00
	BLS	research on rule 59(e) standards	300.00	1.20	360.00
01/18/2024	MDG	Reviewing bankruptcy rules for 14 day stay on orders granting motions to disburse trust funds.	350.00	0.20	70.00
	LSJ	Email exchanges with Guernsey, email to Orenstein (re compliance with Settlement Order) (.1); call Guernsey re contempt by Gabbe (.1); email exchanges with counsel and chambers re scheduling (.1); further email exchange (Dudley,			

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

Account No: 2345.007

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			Rate	Hours	
		Orenstein, McClendon) re Gabbe's filings of dismissals but failure to comply with settlement agreement by filing same with prejudice (.2); telephone conference with Guernsey re 1-30-24 hearing (.2); review Gabbe Default Notice to Dudley (.1); prepare Supplemental Brief re Trustee's Motion for Contempt (.3); prepare Response to Gabbe's Motion to Amend Order (1.3); prepare Supplement to Motion to Hold Gabbe in Contempt (1.0)	475.00	3.40	1,615.00
	BLS	conf. w/ TM re: waiver of Obj. research (.1); find and print research for TM (.3); conf. w/ TM re: interpretation and application of cases in present case (.2)	300.00	0.60	180.00
	BLS	conf. w/ TM re: contempt research	300.00	0.10	30.00
01/19/2024	DM	Prepare edits on Supplement to Motion for Contempt	200.00	0.70	140.00
	DM	Prepare edits on Resp in Opp to Motion to Amend Order	200.00	0.90	180.00
	BD	Review billable statements and create spreadsheet re billable hours re Gabbe motion to compel/contempt (0.8)	150.00	0.80	120.00
	BLS	contempt research for TM	300.00	2.30	690.00
	LSJ	Conference with TM re revisions on pleadings: Supplement to Contempt Motion (.1); and Response to Gabbe Motion to Amend (.2); telephone conference with Guernsey re same (.2); further conference with TM re pleadings (.1); email to various creditor counsel (Dudley, Akemon, and Red Shield) re pending motions and objection deadline (.2)	475.00	0.80	380.00
	BD	Finalize compel/contempt billable hours spreadsheet for TTM review (0.4)	150.00	0.40	60.00
01/21/2024	LSJ	Review entered order granting dismissal with prejudice of all Dudley claims in Long Interpleader (.1). review docket and calendar hearing set on Motion for Contempt filed against Gabbe by creditors Angela Milner et al. (Jan 30 hearing) (.1); review Gabbe's withdrawal of her objections to claims of Krystal Wright, Addie Brooks, Latoya Hughes, Markeka Williams, Angela Milner [all failed to withdraw with prejudice], review and calendar entered order granting expedited hearing on McClendon's Motion to Determine Payee of Disputed Funds (.2); review entered order granting compensation of McNair McLemore, review amended Notice of Hearing on McClendon Motion for Contempt Against Gabbe, further review of Trustee's Motion to Determine Payee of Disputed Funds (as filed) (.3); further review of filed Motion by Trustee to Compel Gabbe Compliance with Settlement Agreement (.1); review Kosachuk affidavit filed in support of Gabbe's Motion to Amend Settlement Agreement (.1); review Jamie Parker's withdrawal of her Motion to Reconsider (filed by Orenstein) as to (Aug 8 filing), review of docket (re hearing prep) (.1)	475.00	1.00	475.00
01/22/2024	LSJ	Conference with TM and email exchanges re objection extensions and filing our amended contempt motion	475.00	0.20	95.00
	BD	Deliver (email and print) contempt billable hours project to TTM (0.1)	150.00	0.10	15.00
	BD	Correspondence to Ronika Jones re mailing address (0.1)	150.00	0.10	15.00
	BD	Prepare and edit Response in Opposition and attach exhibits (0.5)	150.00	0.50	75.00

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Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
	BD	Prepare and edit Supplemental Contempt (0.6)	150.00	0.60	90.00
	BD	Prepare Stipulations to extend for filing (0.1)	150.00	0.10	15.00
	BD	Prepare and file Response in Opposition, Supplemental Contempt, and 2 Stipulations to Extend Time (0.2) Serve Supp on listed parties (0.1)	150.00	0.30	45.00
	DM	Telephone conference with Britteny Gregory about address and name	200.00	0.10	20.00
01/23/2024	BLS	research contempt and start drafting memo	300.00	1.70	510.00
	LSJ	Review parties pleadings oppositions to Gabbe Motion to Amend Order (.2); prepare for contested Jan 30 evidentiary hearing (analysis of evidence to present) (.5); review Red Shield email and Gabbe filings in S.D. Fla (.1); conference with TM re strategy on same (.1)	475.00	0.90	427.50
	BD	Prepare and mail Leave of Absence for TTM to clerk (0.3)	150.00	0.30	45.00
	BD	Telephone conference with Jackie Galardi Torres re notices received in the mail and an update re the second distribution (0.1) Resent a copy of the Motion to Approve Second Distribution via email and mail (0.1)	150.00	0.20	30.00
	TJV	Run and review people search re release of Hammond DSD per TM's request (.2); calls to possible Hammond contacts (.1)	200.00	0.30	60.00
	LSJ	Conference with TM re strategy and case (.2)	475.00	0.20	95.00
01/24/2024	BLS	conf. w/ TM re: response to Motion to Strike	300.00	0.10	30.00
	BD	Prepare, edit, and add exhibits to Emergency Motion in Darden case (0.2)	150.00	0.20	30.00
	BLS	draft response to motion to strike (Darden S.D.Fla)	300.00	2.30	690.00
	DM	Prepare letter re Resp in Opp to Motion for Contempt (Dkt. 733) to be sent out (fed-ex)	200.00	0.20	40.00
	DM	Prepare edits on Emergency Motion to Enforce Stay Proceedings Pending Bankruptcy Court Ruling (S.D.Fla)	200.00	0.50	100.00
	LSJ	Review Red Shield response to Gabbe Motion to Amend Settlement Agreement (.1); prepare Motion to Enforce Stay in S.D. Fla (Darden) (1.4); conference with TM re same (.2); review amendment to Motion to Disburse, conference with TM re same (.2)	475.00	1.90	902.50
	LSJ	Email exchange creditor attorney Dudley re proposal to escrow funds re Bain dispute involving probate estate and Akemon, conference with TM re same (.1); review Gabbe release of attorney lien as to Ameera Brewer only (filed in Milner case in S.D. Fla) (.1); review Kosachuck correspondence alleging compliance (purging) of his contempt (.1)	475.00	0.30	142.50
01/25/2024	BLS	conf. w/ TM re: research for 1/30 hearing	300.00	0.10	30.00
	MDG	Analyzing the timeline of potential appeals and the requirement to post a bond pending appeal.	350.00	0.20	70.00
	MLM	Researching FRE 408 and fraud exception	300.00	0.80	240.00
	BLS	research substantial compliance, sufficiency of notice, and actual notice for motion for contempt	300.00	2.40	720.00
	TJV	Finalize amendment to disbursement motion (.2); file and serve same (.2); prepare stipulations for Harlan Estate & Akemon creditors to respond to disbursement motion (.1); finalize and file same (.2); prepare excel sheet for tax letter mail merge (.4);			

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02/02/2024

Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
		telephone conference with Hammond's wife re execution of DSD release and email to TM re same (.1)	200.00	1.20	240.00
	LSJ	Conference with TM, review Magistrate Order (from S.D. Fla) in Darden case	475.00	0.30	142.50
01/26/2024	TJV	Receipt and review of executed Frontage Road DSD cancellation and submit same for e-recording	200.00	0.10	20.00
	DM	Prepare binder of pleadings for TM and LSJ	200.00	1.40	280.00
	BD	Review HM and MA amended fee amounts for TTM (0.2)	150.00	0.20	30.00
	BD	Prepare Second distribution letters and create mail merge data set for Ainsworth creditors (2.2)	150.00	2.20	330.00
	DM	Finalize Stipulated to and Amendment to Motion to Disburse; file; email all beneficiaries	200.00	0.50	100.00
	BD	Prepare data sets and second distribution letter for Mutepe creditors (1.5)	150.00	1.50	225.00
	MDG	Reviewing issues surrounding the stay pending appeal and supersedeas bonds in bankruptcy appeals.	350.00	1.10	385.00
	LSJ	Conference with TM re Bain claims resolution (.1); email exchanges (TM and Amy Mayer) re filings S.D. Fla. (Darden), review same (.2); conference with TM (hearing prep) (.1); review Stipulation re Bain claims, revise same, telephone conference with TM re same (.4); email exchanges with counsel re same (.2); prepare letter to beneficiaries re distribution 1099 forms (.2); conference with Trustee re same (.2)	475.00	1.40	665.00
	LSJ	Prepare proposed order on Motion to Disburse	475.00	0.10	47.50
01/29/2024	DM	Respond to emails from beneficiaries about Second Distribution Motion	200.00	0.10	20.00
	DM	Update toc for pleadings' binders for TM and LJ	200.00	0.80	160.00
	BLS	meeting w/ TM re: drafting pleading in response to DN 736	300.00	0.20	60.00
	DM	Prepare Status Report DN 137 Darden case; file	200.00	0.60	120.00
	BD	Review and update damages spreadsheet re Gabbe contempt (1.3)	150.00	1.30	195.00
	BLS	draft reply to Gabbe's response to Trustees Motion to Approve Distributions	300.00	2.30	690.00
	BD	Finalize and redact billing statement re: Gabbe's contempt (0.6)	150.00	0.60	90.00
	DM	Finalize Reply to Gabbe's Response to DN 702 and file	200.00	0.20	40.00
	BLS	Edit Reply Brief on disbursements	300.00	0.20	60.00
	MSC	Prepare LSJ changes on order approving 2nd distribution, prepare TTM edits on same, finalize and file notice of same with attachments of proposed order, finalize and file status report	200.00	1.20	240.00
	TJV	Further prep of mail merge spreadsheet for tax letter	200.00	0.60	120.00
	BD	Correspondence (phone and email) to creditor Shanrika Duhart re: updated W-9 (0.1)	150.00	0.10	15.00
	BD	Conference with TJV re people search and SSN search (0.1)	150.00	0.10	15.00
	BD	Online people search and contact information search for creditor Shanrika Duhart (0.5)	150.00	0.50	75.00
	BD	Prepare and update Mutepe Akemon creditors data set for 2nd distribution letter mail merge (0.8)	150.00	0.80	120.00
	BD	Prepare notebooks for 1.30.2024 hearing for TTM (0.2)	150.00	0.20	30.00
	BD	Correspondence to Shanrika Duhart (via phone & email) re: updated W-9 form (0.1) Correspondence with Mutepe Akemon re: same (0.1) Save Duhart W-9 and update contact information			

Galardi Liquidating Trust

02/02/2024

Re: Attorneys for Liquidating Trustee

Account No: 2345.007

Invoice No: 67954

			Rate	Hours	
		(0.1)	150.00	0.30	45.00
	BLS	research equitable mootness; conf. w/ TM re: research; conf. w/ TM re: research	300.00	2.60	780.00
	LSJ	Conference with TM (hearing prep) (.1); prepare proposed order on Distribution Motion (.9); email exchange (Bridges) attorney for Miller Estate re hearing (.1); review all pending motions and TM outline re same (hearing prep on Motion to Disburse) (1.1)	475.00	2.20	1,045.00
01/30/2024	TJV	Prep/finalize tax letter & spreadsheet for mail merge (.3); print/scan tax letter, scan creditor 1099-NEC forms, & compile/finalize and issue tax letter (2.3)	200.00	2.60	520.00
	MSC	Email 1099 forms and correspondence re second distribution to creditors	200.00	0.40	80.00
	BD	Prepare and finalize second distribution letters for Mutepe Akemon creditors (2.0) Continue finalizing (0.4) Check for missing email addresses for creditors (0.1) Correspondence with Ainsworth Dudley re: missing emails (0.1) Email 1099-NEC form and Letters to each creditor (1.1)	150.00	3.70	555.00
	LSJ	Conference with TM re fee applications for Trustee and counsel (.1); review Mitchell Benjamin email exchange re hearing non-appearance, conference with TM re same (.1)	475.00	0.20	95.00
	LSJ	Prepare order on Motion to Disburse (.1); prepare and attend hearing on all pleading motions (3.9); travel to and from Macon (2.8)	475.00	6.80	3,230.00
01/31/2024	MSC	Email creditor Robertson re correspondence re 2023 taxes on distribution (.1), conf TTM on responses to creditors; telephone conference with FedEx re Orenstein address (.1)	200.00	0.30	60.00
	DM	Prepare edits on Order Granting Second Motion to Disburse	200.00	0.60	120.00
	BD	Multiple correspondences to Galardi creditors (Tiffany Thompson, Rasheedah Mays, Marsha Taylor, and Jennifer Ridley) re: 1099 letter/form and emails with Abri Leahong re: her current mailing address and returned mail (0.7)	150.00	0.70	105.00
	BD	Correspondence to Mutepe Akemon re: 1099 letter/forms (0.1) correspondence to Ainsworth Dudley re: 1099 letter/forms (0.1)	150.00	0.20	30.00
	DM	Prepare edits on Order Continuing Evidentiary Hearing	200.00	0.20	40.00
	BD	Prepare Bain data set for 2nd distribution mail merge (0.9)	150.00	0.90	135.00
	BD	Confirm with Abri Leahong and update mailing address (0.1)			
	TJV	Update Jennifer Ridley's mailing address (0.1)	150.00	0.20	30.00
	TJV	Revise KMCL fee application (.1); revise trustee & JW fee applications (.4)	200.00	0.50	100.00
	LSJ	Review Court docket notices re hearings held and orders to be presented calendar hearing (.1), conference with TM re orders and disbursements (.1); email exchanges (Dudley) re his scheduling of Gabbe depositions (.1); email exchanges (Guernsey request to Court re discovery) (.1)	475.00	0.40	190.00
	LSJ	Prepare order on Motion to Disburse and Order Setting Evidentiary Hearing, conference with TM re same	475.00	0.90	427.50
	LSJ	Prepare fee applications for J&W and Trustee	475.00	2.20	1,045.00
		For Current Services Rendered		437.90	130,882.00

Galardi Liquidating Trust

Re: Attorneys for Liquidating Trustee

Page: 25

02/02/2024

Account No: 2345.007

Invoice No: 67954

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Leon S. Jones	0.30	\$0.00	\$0.00
Leon S. Jones	115.10	450.00	51,795.00
Leon S. Jones	37.50	475.00	17,812.50
Tessa Vuncannon	33.50	200.00	6,700.00
Leslie M. Pineyro	0.20	395.00	79.00
Megan Cypher	4.50	200.00	900.00
Ellen Wooden	22.10	200.00	4,420.00
Daniela Manzo	0.80	0.00	0.00
Daniela Manzo	31.40	200.00	6,280.00
Blake Dernus	100.40	150.00	15,060.00
William D. Matthews	0.70	375.00	262.50
Eric J. Breithaupt	1.90	395.00	750.50
Mark D. Gensburg	22.50	325.00	7,312.50
Mark D. Gensburg	1.50	350.00	525.00
Adam Ekbon	17.00	325.00	5,525.00
Mandy L. Milner	2.30	250.00	575.00
Mandy L. Milner	1.40	300.00	420.00
Bethany L. Strain	19.50	250.00	4,875.00
Bethany L. Strain	25.30	300.00	7,590.00

Expenses

10/19/2023	Federal Express	36.18
10/19/2023	Federal Express	69.36
11/01/2023	Online legal research	477.25
12/01/2023	Online legal research	198.75
01/03/2024	Postage (79 @ 2.79)	220.41
01/05/2024	Photocopy charges - Motion and Status Report	284.40
01/09/2024	Federal Express	31.93
01/09/2024	Federal Express (2 @ 50.36)	100.72
01/09/2024	Federal Express	19.08
01/12/2024	Federal Express (2 @ 43.15)	86.30
01/12/2024	Federal Express	31.30
01/12/2024	Postage (75 @ 1.83)	137.25
01/12/2024	Photocopy charges - Motion & Order	110.60
01/12/2024	Federal Express	43.15
01/23/2024	Postage	2.59
01/23/2024	Postage	0.64
01/24/2024	Photocopy charges - Motion	20.90
01/30/2024	Postage (61 @ .64)	39.04
01/31/2024	Online legal research	166.28
	Total Expenses	2,076.13
	Total Current Work	132,958.13

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *Notice of First Application for Compensation of the Attorneys Representing the Liquidating Trustee of the Galardi Creditors Trust, Deadline to Object and for Hearing* ("Notice") and *First Application for Compensation of the Attorneys Representing the Liquidating Trustee of the Galardi Creditors Trust* ("Application") using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Notice and Application to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Michael Akemon** mutepe.akemon@richardslegal.com
- **Mitchell D Benjamin** benjamin@dcbflegal.com, jessicasorrenti@dcbflegal.com; calendar@dcbflegal.com
- **Charles Bridgers** charlesbridgers@dcbflegal.com, jessicasorrenti@dcbflegal.com; calendar@dcbflegal.com
- **Ainsworth G Dudley** adudleylaw@gmail.com
- **Evan Owens Durkovic** ecfgamb@aldridgepite.com, edurkovic@ecf.courtdrive.com
- **Robert G. Fenimore** robert.g.fenimore@usdoj.gov, Ustp.region21.mc.ecf@usdoj.gov
- **Astrid E. Gabbe** astridgabbe@gmail.com
- **Will Bussell Geer** wgeer@rlkglaw.com, notices@nextchapterbk.com; willgeer@ecf.courtdrive.com; 2836@notices.nextchapterbk.com; 6717577420@filings.docketbird.com; geer.willb117921@notify.bestcase.com; emiller@rlkglaw.com; jdowardclay@rlkglaw.com
- **Whitney Warnke Groff** whitney.groff@cobbcounty.org
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- **Brian K. Jordan** ecfgamb@aldridgepite.com, bjordan@ecf.courtdrive.com
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- **Roy E. Manoll** kdd@fbglaw.com
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- **Garrett A. Nail** gnail@pgnlaw.com
- **Jason M. Orenstein** jmopclaw@yahoo.com
- **James D. Silver** jsilver@kklaw.com, raldama@kklaw.com
- **Christopher W. Terry** chris@boyterry.com, terrycr40028@notify.bestcase.com
- **U.S. Trustee - MAC** Ustp.region21.mc.ecf@usdoj.gov

I further certify that on this day I served a copy of the Notice *only* on the parties listed on the attached mailing matrix, via U.S. First Class Mail with adequate postage prepaid:

This 2nd day of February, 2024.

JONES & WALDEN LLC

/s/ Leon S. Jones

Leon S. Jones

Georgia Bar No. 003980

Attorneys for Liquidating Trustee

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Atlanta, Georgia 30308

404-564-9300

ljones@joneswalden.com

Label Matrix for local noticing

113G-5

Case 22-50035-JPS

Middle District of Georgia

Macon

Fri Feb 2 15:49:03 EST 2024

AgSouth Farm Credit, ACA
c/o Fortson, Bentley and Griffin, P.A.

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Building 200, Suite 3A

Athens, GA 30606-6178

American Express National Bank

c/o Becket & Lee, LLP

Attn: Kenneth Kleppinger

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(p)POWER FINANCIAL CREDIT UNION

Document Page 41 of 43

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